3 July 2018

## **DPW List - Project Development**

## A. Site Requirements:

- 1. How many acres? 75 ac with another 25 for contingency.
- 2. Schedule/Timeline: Preliminary, Initial (baseline), schedule updates
- 3. Clearing, Grubbing and Grading Must be in compliance with the Migratory Bird Treaty Act (MBTA).
- 2. SWPP Plan ED will prepare SWPPP and NOI- see below for assumptions and information needed.
  - 3. Fencing
  - 4. Signage, perimeter
  - 5. Retention Basins, Storm water need to be properly sized
  - 6. Facility Layout
  - B. Utilities. Maps/drawings; Nearest sources for each
  - 1. Water/Wastewater:
    - a. Need total demand (33 gal/ppd)
    - b. Water/wastewater lines in trench or above ground?
  - 2. Electrical: Total demand for equipment
  - 3. Gas: N/A
  - 4. HVAC requirements
  - 5. Refuse Service: How many dumpsters/funding by?/Frequency
  - 6. Medical Waste Will they use MEDCOM or their own contract?
  - 7. Hazardous Waste Use Fort Bliss' HW contract and disposal contracts or contract services by proponent?
  - C. Environmental Controls
  - 1. NEPA
  - 2. EA
  - 3. Dust Control- parking surfaces with more than five parking spaces shall be paved or uniformly covered with gravel. Utilize dust control measures for high foot traffic and disturbed areas.
  - 4. Cleaning Up: User shall maintain site clean at all times trash and tires that are discovered on the site cannot be covered with dirt or incorporated into the soil that is expected to be used for the berm on the south side of the site. All water must be segregated (tires stored separate from other solid waste.
  - 5. Federal, State, and Local compliance.
    - Generators- It is expected that power will be supplied initially by generators, however this will only be a temporary measure. See below for the assumptions and information required.
  - D. DPW Administration
    - 1. Correspondence: Routed through DPW POC

- 2. Request for Information (RFI), approved by DPW Director prior to release
- E. Quality Control. Responsibility of contractor
- **F.** Security: To be provided by others?

The list of assumptions and questions listed need to be reviewed ASAP for preparation of the Stormwater Pollution Prevention Plan (SWPPP), air quality evaluation and Spill Prevention Control and Countermeasure Plan (SPCCP) compliance.

## **Assumptions:**

- 1. Housing units will be tents. Number of tents TBD but will fit in the 75 ac parcel.
- 2. Heavy equipment will be used for grading/housing erection
- 3. Generators to supply power will be temporary.
- 4. Using generators (Internal Combustion Reciprocating Engines) in the camp will not trigger any regulatory air requirements since they will be considered a mobile source as per 40 CFR Part 1068. EPA would consider a portable engine stationary and subject to the New Source Performance Standards (NSPS) National Emission Standards for Hazardous Air Pollutants (NESHAP) if it remains at the same location for more than 12 consecutive months. However, if it is determined sometime during that year that they will be needed longer than a year, then at that point, you would have to stop operating and get the correct authorization (permit), which could take 30-60 days or a year or more. Without knowing the size and number of units and their specifications, it is not possible to determine which permit will be required.
- 5. The fuel for the portable generators will be diesel.
- 6. Diesel will be stored in above ground storage tanks with secondary containment to prevent spills.
- 7. No more than 1,000 gallons of diesel will be stored at any given time. DHS will notify DPW-ED immediately upon the first delivery of POL (petroleum, oil and lubricants). Initially POL containers 55-gallons or more can be added to the Fort Bliss Spill Prevention Control and Countermeasure Plan (SPCCP) and tracked for inspection requirements. A DHS POC will be provided to coordinate access to the site for photos, inventory and training. Training would include guidance on secondary containment, spill response and how to conduct monthly inspections on any tanks and generators as part of the petroleum storage tank (PST) program.
- 8. Not to exceed six months after occupancy, DHS will develop/complete its own SPCCP. DPW-ED can review/comment if needed.
- 9. Dig permits will be submitted to DPW prior to any excavation/clearing activities.
- 10. Stormwater retention/detention will be within the 75 ac parcel

## Information required.

- 1. The laydown yard be located at Site Monitor or within the 75 acres?
- 2. Will there be hazardous materials stored on site, other than fuel for generators?
- 3. Will there be maintenance of equipment done on site?
- 4. Will there be a vehicle washout area?
- 5. Will the project include concrete placement? If so, a concrete washout area is required.
- 6. Besides equipment for excavating/grading, what other material will be stored on site (piping, wood, steel)?

- 7. Provide layout of area, including where chemical latrines will be located, where tents are expected to be located, generators, laydown yard, POL storage area, etc.
- 8. Number of generators to be used, all specifications for the generators (plate information), run time (hours) and number of days they expect to be in operation.
- 9. Will the generators be required for longer than a year? If so, DHS must obtain required authorization per 40 CFR part 60 subpart iiii (4207). Depending on the number, type and run time, etc. the possible authorizations could be:
  - a) PI-7: Permit by rule (PBR). This can be used for non-emergency generators. It has preestablished conditions and all must be met takes 30-60 days to complete.
  - b) PI-1S (standard permit)-A step up from the PBR. Also, with pre-established conditions but for larger units and more specific takes 30-60 days to complete.
  - c) PI-1 (case-by-case) you can structure the conditions to meet how you operate as long as they meet the regulations. You propose your methods and show them to TCEQ. That's why it takes longer takes a year or more to complete.